

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2017-245-E

In the Matter of:)	PETITION TO INTERVENE OF
)	SOUTHERN ALLIANCE FOR
Application of Duke Energy)	CLEAN ENERGY AND SOUTH
Progress, LLC for Approval of)	CAROLINA COASTAL
Rider DSM/EE-9)	CONSERVATION LEAGUE

The Southern Alliance for Clean Energy (“SACE”) and the South Carolina Coastal Conservation League (“CCL”) (collectively, “Petitioners”), through counsel, hereby petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. On August 1, 2017, Duke Energy Progress, LLC (“DEP”) filed its application for approval of Rider DSM/EE-9 (“Rider 9”) to recover certain costs and revenue associated with its demand-side management and energy efficiency programs, in accordance with Order No. 2009-373, issued in Docket No. 2008-251-E, and Order No. 2015-596, issued in Docket No. 2015-163-E.

2. DEP seeks to recover, through its proposed Rider 9, DSM/EE costs incurred from January 1, 2016 through December 31, 2016, forecasted costs covering January 1, 2018 through December 31, 2018, net lost revenues, and program/portfolio performance incentives. DEP requests that the proposed Rider 9 become effective on January 1, 2018.

3. SACE is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee, 37901. SACE also has offices in Florida, Georgia, North Carolina, and South Carolina. SACE has members in South Carolina who receive electricity service from DEP and who are subject to the direct impacts of DEP's DSM/EE rider. SACE and its members are interested in promoting greater reliance on energy conservation and efficiency to meet South Carolina's energy needs.

4. CCL is a nonprofit corporation organized under the laws of the state of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina, 29402. As an advocate for conservation and energy efficiency, CCL supports the development of energy policy that is in the public interest of South Carolinians and promotes energy savings. CCL has members in South Carolina who receive electricity service from DEP and who are subject to the direct impacts of DEP's DSM/EE rider. CCL and its members are interested in promoting greater reliance on energy efficiency as an energy resource in South Carolina.

5. Petitioners participated actively as parties in Docket No. 2008-251-E, regarding the cost recovery and incentive mechanisms pursuant to which DEP has filed its application in this proceeding. Petitioners also participated in the past six annual DSM/EE rider proceedings, Docket Nos. 2011-181-E, 2012-93-E, 2013-76-E, 2014-89-E, 2015-323-E, and 2016-289-E.

6. Petitioners seek to intervene in this proceeding in order to ensure that their interests and their members' interests in promoting energy savings through energy efficiency are represented.

7. Petitioners do not seek a hearing in this proceeding. Petitioners have not yet fully developed their position but plan to present it in written comments to be filed with the Commission by October 15, 2017, pursuant to the procedural schedule established in Order No. 2014-766, Docket No. 2013-92-A. Should a public hearing be scheduled in this docket, Petitioners seek to reserve the right to participate in the hearing as parties of record.

8. Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 15th day of September, 2017.

s/ Elizabeth Jones
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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail and/or electronic mail with a copy of the Petition to Intervene of Southern Alliance for Clean Energy and the South Carolina Coastal Conservation League.

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This 15th day of September, 2017.

s/ Robin G. Dunn